

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

JOANN INC.,¹

Post-Effective Date Debtor.

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Chapter 11

Case No. 25-10068 (CTG)

**CERTIFICATION OF COUNSEL FOR THE PLAN ADMINISTRATOR
REGARDING APPROVAL OF STIPULATION REGARDING CLAIMS OF
JONES LANG LASALLE AMERICAS, INC.**

The undersigned counsel to Ann Aber, the Plan Administrator (the “Plan Administrator”) appointed in the above-captioned case, hereby certifies as follows:

1. On April 4, 2025, Jones Lang LaSalle Americas, Inc. (“JLL”) filed Proof of Claim No. 11752 (“Claim 11752”). Claim 11752 was filed as an administrative expense claim under 11 U.S.C. § 503(b)(9) in the amount of \$149,817.63 (the “503(b)(9) Claim”), a postpetition administrative expense claim for the period of January 15, 2025 (the “Petition Date”) through February 26, 2025, in the amount of \$822,942.42 (the “First Administrative Expense Claim”), and as a general unsecured claim in the amount of \$2,616,620.70 (the “GUC Claim”).

2. On June 30, 2025, the debtors in the above-captioned case filed *Debtors’ Ninth Omnibus Objection to Certain Claims* [Docket No. 1317] (“Ninth Omnibus Objection”) seeking to reclassify the 503(b)(9) Claim, in its entirety, as a general unsecured claim.

3. On August 6, 2025, JLL filed Proof of Claim No. 19789 (“Claim 19789”) asserting a supplemental postpetition administrative expense claim in the amount of \$719,698.10

¹ The Post-Effective Date Debtor in this chapter 11 case, along with the last four digits of its federal tax identification number is JOANN Inc. (5540). The Post-Effective Date Debtor’s mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

(the “Supplemental Administrative Expense Claim” and together with the First Administrative Expense Claim, the “Administrative Expense Claims”).

4. JLL and the Plan Administrator (collectively, the “Parties”) have entered into a stipulation (the “Stipulation”) fully resolving the Administrative Expense Claims, the 503(b)(9) Claim, and the Ninth Omnibus Objection, solely as it relates to JLL’s 503(b)(9) Claim.

5. A proposed order approving the Stipulation is attached hereto as **Exhibit A** (the “Proposed Order”).

6. A copy of the Stipulation is attached as **Exhibit 1** to the Proposed Order.

Accordingly, the Plan Administrator respectfully requests entry of the Proposed Order at the Court’s earliest convenience.

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Dated: December 29, 2025
Wilmington, Delaware

/s/ Michael E. Fitzpatrick

COLE SCHOTZ P.C.

Patrick J. Reilley (No. 4451)

Stacy L. Newman (No. 5044)

Jack M. Dougherty (No. 6784)

Michael E. Fitzpatrick (No. 6797)

500 Delaware Avenue, Suite 600

Wilmington, Delaware 19801

Telephone: (302) 652-3131

Facsimile: (302) 652-3117

Email: preilley@coleschotz.com

snewman@coleschotz.com

jdougherty@coleschotz.com

mfitzpatrick@coleschotz.com

- and -

HAHN LOESER & PARKS LLP

Christopher B. Wick (admitted *pro hac vice*)

Philip K. Stovall (admitted *pro hac vice*)

200 Public Square, Suite 2800

Cleveland, Ohio 44114

Telephone: (216) 274-2489

Facsimile: (216) 241-2824

Email: cwick@hahnlaw.com

pstovall@hahnlaw.com

Co-Counsel to the Plan Administrator